

## **REMARKS**

Claims 20-24, 26, 32-35, 40, 49, 52, 55 and 57-72 are pending in the application. Allowance of the claims is respectfully requested.

### **35 U.S.C. § 102(e) Rejection**

Claims 20-24, 26, 32-35, 40, 49, 52, 55 and 57-72 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Number 5,056,019 issued to Lakritz et al. (herein referred to as "Lakritz"). The Applicant respectfully traverses the rejection.

**Independent Claim 20** is directed to a method which in part recites,

- "compiling a computer-servable document written for a particular locale to extract and remove characters associated with any original locale-sensitive content, the compiling producing a compiled document with locale-independent elements;
- storing the original locale-sensitive content;
- substituting a function call in place of associated removed original locale-sensitive content in the compiled document; and
- at runtime, retrieving the compiled document and populating the compiled document with a desired version of the original locale-sensitive content, wherein the populating comprises executing the function call in the compiled document to obtain the desired version of the associated original locale-sensitive content and to insert the desired version of the associated original locale-sensitive content back into the compiled document."

Applicant traverses the rejection for at least the following reasons. Lakritz fails to anticipate Claim 20 under 35 U.S.C. §102(e) because Lakritz does not disclose, either directly or inherently, every feature of Claim 20 as is required for a reference.

In the pending rejection, the Office has primarily relied on the Lakritz disclosure appearing at Col.6-7, discussing toolkit 402, as disclosing the present features. Applicant disagrees that Cols. 6-7 or any portion of Lakritz discloses the claimed features. In particular, Lakritz, Col. 6 lines 58-60 (reproduced below) discloses a mechanism in which a template includes placeholders for removed country and language specific information.

50 With respect to FIGS. 4 and 5, the toolkit 402 also features  
a novel mechanism to create localized content for specific  
geographic regions or countries by using a template-based  
approach to dynamically create documents tailored for a  
specific language or country. This feature makes it easy to  
55 create a true global site localized for each area of the world  
with the smallest achievable site footprint on the Web server  
503.

A template contains placeholders for country and  
language-specific information that has been removed from a  
60 document. This information is dynamically inserted from a  
TermDB 508 (an external glossary), another template or  
document located in a database or file system 509, or  
provided automatically by the Developer module 502 when  
the composite document is presented to the browser 501.

Lakritz describes that the information is dynamically inserted from a “TermDB 508 (an external glossary)” and fails to disclose storing the original locale-sensitive content. Rather, Lakritz discloses using a “TermDB” 508 which is not described as including “original locale-sensitive” content.

The Office’s further citation to Col. 5, lines 11-14 as disclosing “storing the original locale-sensitive content” is misplaced as the passage does not disclose the

content of TermDB 508 but instead, discloses keeping “translated” content in a “Language Database/File system.” *Lakritz*, Col. 5, lines 27-29.

The Col. 5 passage also fails to provide any disclosure which would indicate that the content stored in “Language Database/File system” is in-fact original to a “computer-servable document.” The “actual language content”, cited by the Office appears to be nothing more than the “translated content” which is stored in the “Language Database/File system” database rather than with the master site.

Similarly, the Office’s citation of Col. 7, lines 38-40 (below) fails to disclose storing the “original locale sensitive content.”

The invention also allows multilingual content to be served even if an HTML file is not specially tagged (i.e., the file is an ordinary HTML file, not a template). When an ordinary HTML file is served, the HTML is parsed and the translatable text is extracted in the same manner as if it had been specially tagged. The corresponding translations are retrieved from one or more language databases and served.

Instead, the *Lakritz* passage merely discloses a translation system in which the “translatable text” is extracted when served. In this way, the reference fails to (at least) disclose “compiling a computer-servable document written for a particular locale to extract and remove characters associated with any original locale-sensitive content, the compiling producing a compiled document with locale-independent elements” because the HTML file has not been compiled producing “a compiled document with locale-independent elements.”

Additionally, the “parser” disclosure from *Lakritz*, Col. 7 line 20 – Col. 8, line 63 is different from the “template” procedure disclosed from the Col. 6, line 50 –Col. 7, line 19. This position is further bolstered by the disclosure that the

“parser” system does not implement placeholder or tags (discussed in Col. 6, line 50 –Col. 7, line 19 but instead merely translates content as the content is served. Lakritz, Col. 7, line 20-22. This is to say, Lakritz switches between a template that includes a placeholder for removed content, and a parser system that translates as the content is served at Col. 7, lines 20-22.

Further, the citation of Lakritz Col. 2, lines 28-34 as disclosing “at runtime, retrieving the compiled document and populating the compiled document with a desired version of the original locale-sensitive content” is incorrect as the passage does not deal with the toolkit feature discussed at Cols. 6-7. The foregoing passage is merely directed to the master site scenario in which the master site is developed independently of a language/country. As a result, the independent master site procedure does not disclose the feature of “compiling a computer-servable document written for a particular locale to extract and remove characters associated with any original locale-sensitive content, the compiling producing a compiled document with locale-independent elements.”

In contrast, Claim 20 recites the features of “compiling a computer-servable document written for a particular locale to extract and remove characters associated with any original locale-sensitive content, the compiling producing a compiled document with locale-independent elements” and “storing the original locale-sensitive content.” The presently recited features are not disclosed with respect to Col. 2, because Lakritz fails to disclose storing “original locale-sensitive

content” because the Lakritz master site is “independent” to begin with, and does not use original “locale-sensitive content.”

This is to say, Lakritz does not disclose “extracting and removing characters associated with any original locale-sensitive content” because in the cited example, Lakritz generates an independent master site and then populates language and country information, instead of using “a computer-servable document written for a particular locale” which may include “locale-sensitive content.” An anticipating reference must describe the patented subject matter *with sufficient clarity and detail* to establish that the subject matter existed and that its existence *was recognized by persons of ordinary skill in the field of invention.*” *ATD Corp.v. Lydall, Inc.*, 48 USPQ.2d 1321, 1328 (Fed. Cir. 1998) citing *In re Spada*, 15 USPQ.2d 1655, 1657 (Fed. Cir. 1990). Emphasis added. In light of the foregoing, removal of the pending 35 U.S.C. §102(e) rejection is requested and allowance is solicited.

The pending rejection under 35 U.S.C. §102(e) of **Claims 21-24 and 26** is improper based on the same rationale as discuss with respect to Independent Claim 20 from which Claims 21-24 and 26 depend. Applicant traverses the rejection. Claims 21-24 and 26 recite additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

**Independent Claim 32** is directed to a system which in part recites,

- “at least one computer-servable document stored in a computer-readable medium, the document being written for a particular locale;
  - a compiler to automatically extract and remove characters associated with any original locale-sensitive content from the document to produce a compiled document containing locale-independent elements,
- wherein the compiler stores the original locale-sensitive content in a data structure separate from the compiled document,
- and wherein the compiler substitutes a function call in place of associated removed original locale-sensitive content in the compiled document;”

Applicant traverses the rejection for at least the following reasons. The citation of Lakritz Col. 7, lines 41-42 and Col. 5, lines 11-14 fail to disclose each and every feature recited in Claim 32. Additionally, the citations also are inconsistent between the two passages. As discussed above, the Lakritz Col. 7 citation discloses a parser system in which the translation occurs upon serving the localized HTML stream. Thus, this portion fails to disclose “a compiler to automatically extract and remove characters associated with any original locale-sensitive content from the document to produce a compiled document containing locale-independent elements.”

Instead, the Col. 7 portion discloses translation at “serving” instead of using a compiler “wherein the compiler stores the original locale-sensitive content in a data structure separate from the compiled document.” The Col. 5 citation is

inappropriate as the passage (at least) fails to disclose “a compiler to automatically extract and remove characters associated with any original locale-sensitive content from the document to produce a compiled document containing locale-independent elements.” There is no disclosure, in Lakritz, which would suggest that the Col. 5 and Col. 7 implementations are “interchangeable.” In contrast, Lakritz generally indicates that the foregoing passages are not interchangeable as Col. 5 is directed to an independent master site system while Col. 7 is directed to a “parser” system in which translation occurs as the content is served.

For at least the foregoing reasons, the pending rejection is improper. Removal of the pending rejection is requested and allowance is solicited.

The pending rejection under 35 U.S.C. §102(e) of **Claims 33-35 and 40** is improper based on the same rationale as discuss with respect to Independent Claim 32 from which Claims 33-35 and 40 depend. Applicant traverses the rejection. Claims 33-35 and 40 recite additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

**Independent Claim 49** is directed to a system which in part recites,

- “compilation means for compiling a computer-servable document written for a particular locale to extract and remove characters associated with any original locale-sensitive content, the compilation means producing a compiled document with locale-independent elements;

- storage means for storing the original locale-sensitive content extracted from the computer-servable document in a data structure separate from the compiled document,

- wherein the compilation means comprises substitution means for substituting a function in place of associated removed original locale-sensitive content in the compiled document, the function representing the associated removed original locale-sensitive content extracted from the compiled document;”

- “wherein the populating comprises executing the function call in the compiled document to obtain the desired version of the associated original locale-sensitive content and to insert the desired version of the associated original locale-sensitive content back into the compiled document.”

Applicant traverses the rejection for at least the following reasons. Lakritz fails to anticipate the present claim because not every feature of Claim 49 is disclosed either directly or inherently as is required for a reference under 35 U.S.C. §102(e).

As discussed generally with respect to the above matters, the Lakritz, Col. 7 lines 41-42 and the Col. 5, lines 11-14 citations are not interchangeable. Thus, one cannot take the parser system disclosed at Col. 7 and implement the database disclosed in Col. 5 to anticipate the present invention because Lakritz does not disclose this “interchangeability.” This is to say, that while the Col. 5 system uses a master site, Col. 7 discusses a translating as the content is “served.”



Further, the "database 403" is not described as storing "original locale-sensitive content." Instead, Col. 5 line 27 describes the database as including "translated content" (e.g., content which has been translated in some manner.)

Additionally, the parser system disclosed in Col. 7 does not disclose "the compilation means producing a compiled document with locale-independent elements" because the parser performs the translation as the content is served. *Lakritz*, Col. 7, lines 38-40 (reproduced below).

The string "Here is some text" is marked as translatable by the parser. The entire string is then presented to one or more language databases, the translation is obtained in the desired language, and then served to the browser.

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In light of the foregoing, removal of the pending rejection is requested and allowance is solicited.

The pending rejection under 35 U.S.C. §102(e) of **Claim 52** is improper based on the same rationale as discussed with respect to Independent Claim 49 from which Claim 52 depends. Applicant traverses the rejection. Claim 52 recites additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

**Independent Claim 55** is directed to one or more computer-readable media comprising computer-executable instructions that, when executed which in part recites,

- "extract and remove characters associated with any original locale-sensitive content from the source code;
- store the original locale-sensitive content in a separate file; and

- substitute in place of the removed original locale-sensitive content in the document, function calls which, when executed at runtime, re-supply a desired version of the original locale-sensitive content to the document.”

Applicant traverses the rejection for at least the following reasons. Lakritz fails to anticipate the present claim because not every feature of Claim 55 is disclosed either directly or inherently as is required for a reference under 35 U.S.C. §102(e).

Lakritz fails to anticipate Claim 55 because the cited “parser” disclosure in Col. 7 and the “database” disclosed in Col. 5 are not disclosed as being “interchangeable.” Instead, the Lakritz passages disclose separate implementations which are distinct (i.e., a master site system is inconsistent with the parser system which translates as the content is served).

Even if we were to combine the passages, for arguments sake, the disclosure fails to teach every feature recited in Claim 55. In particular, the parser system merely translates the content as the content is being served. For example, “[t]he translatable segments are presented to one or more language databases to obtain their translations” at which time the HTML generator is invoked to serve the stream to the browser. *Lakritz*, Col. 7, lines 40-48. Additionally, the database 403 described in Col. 5 does not store “original locale-sensitive content” but instead stores translated content. *Lakritz*, Col. 5 line 27.

The pending rejection under 35 U.S.C. §102(e) of **Claims 57-60** is improper based on the same rationale as discuss with respect to Independent Claim

26 from which Claims 57-60 depend (either directly or indirectly). Applicant traverses the rejection. Claims 57-60 recite additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

The pending rejection under 35 U.S.C. §102(e) of **Claims 61-64** is improper based on the same rationale as discuss with respect to Independent Claim 26 and intervening Claim 40 from which Claims 61-64 depend (either directly or indirectly). Applicant traverses the rejection. Claims 61-64 recite additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

The pending rejection under 35 U.S.C. §102(e) of **Claims 65-68** is improper based on the same rationale as discuss with respect to Independent Claim 52 and intervening Claim 52 from which Claims 65-68 depend (either directly or indirectly). Applicant traverses the rejection. Claims 65-68 recite additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

The pending rejection under 35 U.S.C. §102(e) of **Claims 69-72** is improper based on the same rationale as discuss with respect to Independent Claim 55 from which Claims 69-72 depend (either directly or indirectly). Applicant traverses the rejection. Claims 69-72 recite additional features which are not found in the art of record. Removal of the pending rejection under 35 U.S.C. §102(e) is requested and allowance is solicited.

*Conclusion*

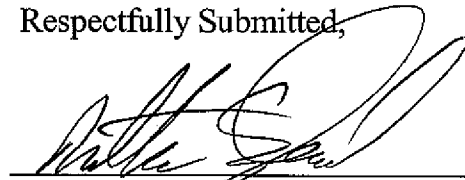
The arguments presented above are not exhaustive; Applicant reserves the right to present additional arguments to fortify Applicant's position. Further, Applicant reserves the right to challenge the prior art status of one or more documents cited in the Office Action.

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance and such allowance is respectfully solicited. The Examiner is urged to contact the undersigned if any issues remain unresolved by this Amendment.

Respectfully Submitted,

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